

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.**

In the Matter of)	
)	
Amendment of Parts 73 and 74 to further)	RM-11810
implement the Local Community Radio Act)	
of 2010 and make other improvements to the)	
Low Power FM Service)	

TO:: The Commission

COMMENTS OF JAMES KNYBEL

My name is James Knybel. I am responding to the FCC's invitation to comment on the Petition for Rulemaking filed by REC Networks in the above-identified proceeding. Among other things, REC Networks proposed that the Commission's rules be amended so as to increase to 250 watts the maximum permissible effective radiated power for LPFM stations. I strongly support this proposal.

I am the station manager for low power FM station WSFT-LP, Berrien Springs, Michigan. I have been providing day to day technical support to this station for 14 years. Over the last three years I have also provided technical support for several other LPFM stations. My experience tells me that, in many cases, 100 watts is wholly inadequate for providing an acceptable broadcast service to the LPFM station's community. An increase of permitted ERP for LPFM stations is a much-needed option necessary to help achieve a reasonably adequate listener experience and to truly accomplish the goals of the Local Community Radio Act.

In my local area, WSFT-LP and WBSV-LP, both licensed to Berrien Springs, Michigan, have had intermittent static issues in their broadcasts regularly within their community of license.

For general background reference, Berrien Springs is located in a river valley. Ground elevation at the common antenna site for both stations is roughly 772 feet. The river location is at 605 feet. The main area of town is at 667- 672 feet with another transition out of town to 730 feet. Andrews University Airport also poses a complication for broadcast coverage in the community. This limits the number of possible tower locations. Several engineering studies were completed to find a suitable location for WBSV-LP without success because of the restrictions surrounding the airport. The optimal location for WBSV-LP turned out to be the existing antenna site for WSFT-LP.

I make it a point to regularly listen to WSFT-LP and WBSV-LP at my residence. They are four miles east of my residence. Often, I am unable to receive a satisfactory signal on a regular basis using a high-performance directional antenna connected to a high-end stereo receiver; frequently there is intermittent static. In an attempt to improve the situation, I recently purchased a new professional FM tuner, hoping to get a good quality broadcast from WSFT-LP. I also tried to get reception from WBSV-LP. I am not able to receive any broadcast from either station using this new tuner. At the same time, signals from full power stations are received with the FM tuner with good fidelity. Over the years I have purchased a number of other FM receivers to use to listen to WSFT-LP (and most recently WBSV-LP). I have not been successful receiving a routinely suitable and reliable broadcast signal. To do so, the radios and antennas need to be positioned and re-positioned again and again, on their sides, on their backs, etc. This is very frustrating. The casual listener is quickly discouraged and moves on.

In an age of multiple listening platforms and opportunities, terrestrial radio, if it is to be viable, must produce an enjoyably listenable signal. This is especially true for local community

broadcasters. The local community licensees who are struggling with issues about the quality of their broadcast signals need to be able to produce quality interference-free reception. Such reception would be more common if stations could operate with 250 watts.

WSFT-LP listeners tell me that they are most often listening while traveling in their cars. Most of the time, they are not confining their journeys to the very small radius around the station's antenna site where listening may be possible. Listeners frequently traverse the station's small service area on their way to work or other activities. The signal will then deteriorate with static, mush and garble. This problem could be mitigated with the use of stronger broadcast power, allowing the mobile audience a larger area for decent reception.

Upgrading LPFM stations would also enhance the service they could provide in connection with the Emergency Alert System. LPFM licensees are required to purchase, maintain, and update EAS equipment for the public benefit. However, much of the effort and resources used to deploy and maintain the EAS at LPFM stations are to no avail because a routinely sufficient quality broadcast is not often possible. An emergency alert on an unlistenable station services no purpose.

The public would be better served by 250-watt LPFM stations that could actually provide usable aural service over a significant area. I urge the FCC to adopt REC Network's proposal to allow LPFM stations to operate with up to 250 watts of ERP.

Respectfully submitted,

/James Knybel/
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